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STATE OF ILLINOIS ILLINOIS COMMERCE COMM	Har 1	11.50	Ho.			
ILLINOIS COMMERCE COMM	ISSION					

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CITIZENS UTILITIES COMPANY OF ILLINOIS	,		
1/b/a CITIZENS WATER RESOURCES)		
)		
Petition for a Certificate of Public Convenience)	Docket No.	01-0001
and Necessity to provide water service to areas in and)		
near the Village of Bolingbrook, Will and DuPage	Ó	-	
Counties, pursuant to Section 8-406 of the Public)		
Utilities Act.	Ś		

SECOND MOTION TO AMEND PETITION

NOW COMES Citizens Utilities Company of Illinois d/b/a Citizens Water Resources ("Citizens" or "the Company"), by and through its counsel, and pursuant to 83 Ill. Admin. Code § 200.140, moves to amend its Petition filed with the Illinois Commerce Commission ("Commission") in this Docket. In support of this request, Citizens states as follows:

- 1. On January 2, 2001, pursuant to Section 8-406 of the Public Utilities Act ("PUA"), 220 ILCS 5/8-406, Citizens filed with the Commission its Petition ("January 2 Petition") for both a temporary and permanent Certificate of Public Convenience and Necessity authorizing Citizens to provide water service in and near the Village of Bolingbrook ("Village of Bolingbrook" or "Village"), Will and DuPage Counties, Illinois, and its Proposed Interim Order that would have granted the Company, if adopted by the Commission, a temporary Certificate of Public Convenience and Necessity.
- 2. Citizens attached as Appendix A to its January 2 Petition and Proposed Interim

 Order a map depicting the areas for which Citizens sought certification. In the January 2

Petition, Citizens stated that, during the proceedings, Citizens would provide a more specific description of the areas for which certification was sought.

- 3. On January 24, 2001, Citizens filed with the Commission a Motion to Amend Petition requesting that the Commission amend Citizens' January 2 Petition by attaching a boundary description and a revised map depicting the areas for which Citizens sought certification.
- 4. Citizens and Staff have since entered into a Joint Stipulation resolving certain issues in this proceeding. By this Joint Stipulation, Citizens has agreed, *inter alia*, to withdraw its request for a temporary Certificate of Public Convenience and Necessity, and has agreed to limit its relief in this case to a permanent Certificate of Public Convenience and Necessity to be issued by means of an interim order for the reduced service area described and depicted in Appendix A to this Second Motion to Amend Petition.
- 5. Citizens respectfully moves to amend Citizens' Petition by withdrawing its request for a temporary Certificate of Public Convenience and Necessity and requests that the Commission replace the map attached as Appendix A to Citizens' Petition and Proposed Interim Order filed on January 2, 2001, as amended by Citizens' January 24, 2001 Motion to Amend Petition, with the revised map and boundary description attached hereto, which specifically describes and depicts the areas for which Citizens is now seeking a permanent Certificate of Public Convenience and Necessity.

Respectfully submitted,

CITIZENS UTILITIES COMPANY OF ILLINOIS d/b/a CITIZENS WATER RESOURCES

By: Muzela W. OBrien

Stephen J. Mattson Angela D. O'Brien Mayer Brown & Platt 190 S. LaSalle Street Chicago, IL 60603-3441 (312) 782-0600

Lee Ann Conti Citizens Communications Company 1000 Internationale Parkway Woodridge, IL 60517 (630) 739-8868

Dated: February 28, 2001

STATE OF ILLINOIS)	
)	SS
COUNTY OF COOK)	

VERIFICATION

Angela D. O'Brien, being first duly sworn under oath, states that she is counsel for Citizens Utilities Company of Illinois d/b/a Citizens Water Resources; and that she has read the foregoing Second Motion to Amend Petition and knows the contents thereof; and that the facts set forth therein are true to the best of her knowledge and belief.

Chieda O Brull Angela D O'Brien

Subscribed and sworn to before me this 28th day of Fibruary 2001.

"OFFICIAL SEAL"
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NANCY PUBLIC STATE OF ILLINOIS
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My Commission expires: 12/9/2001

CERTIFICATE OF SERVICE

I, Angela D. O'Brien, an attorney, hereby certify that I caused copies of the foregoing Proposed Agreed Interim Order and Second Motion to Amend Petition to be served on all parties listed below by Overnight Courier, Messenger, or United States Mail, First Class, postage prepaid, on this 28th day of February, 2001.

Erin O'Connell-Diaz John Riley Hearing Examiners Illinois Commerce Commission 160 North LaSalle Street Suite C-800 Chicago, IL 60601 (Via Messenger)

Joe Clennon
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
(Via Overnight Courier)

John Reichart Illinois Commerce Commission 160 North LaSalle Street Suite C-800 Chicago, IL 60601 (Via Messenger)

Roy King
Ray Pilapil
Tom Smith
Scott Struck
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701
(Via Overnight Courier)

Village Clerk April Holden 801 Burlington Avenue Downers Grove, IL 60515

Village Clerk Charlene Smollen 418 Main Street Lemont, IL 60439

Village Clerk Prudence Pukula Village Hall 13 Montrose Drive Romeoville, IL 60446

Village Clerk Sue Janik 530 West Lockport Street Plainfield, IL 60544

City Clerk Suzanne L. Gagner P.O. Box 3020 Naperville, IL 60566-7020

Illinois Department of Agriculture P.O. Box 19281 State Fairgrounds Springfield, IL 62794-9281

Village Clerk Marcia Smith 5 Plaza Drive Woodridge, IL 60517